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10 Attorneys for Plaintiff
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 VIRTUAL CURRENCY AND
17 \$2,061,517.68 IN U.S. CURRENCY,
18 Defendants.

Case Number 2:25-cv-04631-SB-MAR

STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL SERVED
COMPLAINT BY NOT MORE THAN 30
DAYS

[Civil Local Rule 8-3]

Complaint Served: August 13, 2025

Current Claim Due Date: Sept. 17, 2025

Current Answer Due Date: Oct. 8, 2025

New Claim Due Date: Oct. 17, 2025

New Answer Due Date: Nov. 7, 2025

24
25 Pursuant to Civil Local Rule 8-3, plaintiff United States of America and potential
26 claimant Dish Network LLC (and its affiliated companies) ("Potential Claimant") hereby
27 stipulate and agree to extend the time for Potential Claimant to respond to the initial
28 complaint served in this action. The complaint was served August 13, 2025. Potential

1 Claimant's time to file a claim to contest the forfeiture of the defendants is September
2 17, 2025, and an answer to the complaint is due twenty-one (21) days thereafter (*i.e.*,
3 October 8, 2025). *See* Suppl. Rule G(4)(b)(ii) of the Federal Rules of Civil Supplemental
4 Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. The parties have
5 agreed to a thirty-day extension of these deadlines. Accordingly, potential claimant's
6 time to file a claim to the defendants is extended to October 17, 2025, and an answer or
7 other responding document to the complaint is extended to November 7, 2025.

8 Dated: September 17, 2025

Respectfully submitted,

9
10 BILAL A. ESSAYLI
Acting United States Attorney
11 JOSEPH T. MCNALLY
Assistant United States Attorney
12 Acting Chief, Criminal Division
JONATHAN GALATZAN
13 Assistant United States Attorney
14 Chief, Asset Forfeiture & Recovery Section

15 /s/ James E. Dochterman

16 JAMES E. DOCHTERMAN
17 Assistant United States Attorney
18 Asset Forfeiture & Recovery Section

19 Attorneys for Plaintiff
20 UNITED STATES OF AMERICA

21 DATED: September 17, 2025

/s/ with permission

22 REES F. MORGAN
23 Coblentz Patch Duffy & Bass LLP

24 Attorney for Potential Claimant
25 DISH NETWORK LLC
26
27
28

PROOF OF SERVICE BY E-MAIL

I am a citizen of the United States and a resident of or employed in Los Angeles County, California; my business address is the Office of United States Attorney, 312 North Spring Street, 11th Floor, Los Angeles, California 90012; I am over the age of 18; and I am not a party to the above-titled action;

On September 17, 2025, I served a copy of: **STIPULATION TO EXTEND THE TIME TO RESPOND TO INTIAL SERVED COMPLAINT BY NOT MORE THAN 30 DAYS** on each person or entity named below by transmitting the document by electronic mail to the e-mail address indicated for receipt of e-mail on the date and place shown below following our ordinary office practices. Each person has given consent to receive service by e-mail.

TO: REES F. MORGAN
Coblentz Patch Duffy & Bass LLP
1 Montgomery St #3000
San Francisco, California 94104
rmorgan@coblentzlaw.com

I am readily familiar with the practice of this office for transmittal of electronic mail from a desktop computer which allows for confirmation that an e-mail message was sent on a particular day and time. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on September 17, 2025, at Los Angeles, California.

Paul J. Read
PAUL J. READ
Paralegal, FSA